

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

Rembrandt Wireless Technologies, LP,

Plaintiff,

v.

Samsung Electronics Co., Ltd.,  
Samsung Electronics America, Inc.,  
Samsung Telecommunications America, LLC,  
Samsung Austin Semiconductor, LLC,  
Blackberry, Corp., and  
Blackberry, Ltd.,

Defendants.

Case No. 2:13-cv-213-JRG-RSP

JURY TRIAL DEMANDED

**DECLARATION OF GERARD A. HADDAD IN SUPPORT OF DEFENDANTS'  
MOTION FOR SUMMARY JUDGMENT OF NO DAMAGES PRIOR TO THE FILING  
DATE OF THE COMPLAINT FOR FAILURE TO MARK**

I, Gerard A. Haddad, declare as follows:

1. I make this declaration in support of Defendants' Motion For Summary Judgment Of No Damages Prior To The Filing Date Of The Complaint For Failure To Mark.

2. I am an attorney with the law firm of Dickstein Shapiro LLP, counsel for Samsung in this litigation.

3. I have personal knowledge of the facts set forth below and, if called upon, am willing to testify to the same.

4. Attached as Exhibit 1 is a true and correct copy of a compilation of patent sale agreements numbered RIP 00006594-6667, previously marked as Schneck Deposition Exh. 9.

[Filed Under Seal]

5. Attached as Exhibit 2 is a true and correct copy of Rembrandt's response to common interrogatory No. 2. [Filed Under Seal]

6. Attached as Exhibit 3 is a true and correct copy of excerpts from the deposition of Rembrandt's 30(b)(6) witness Derek Wood. [Filed Under Seal]

7. Attached as Exhibit 4 is a true and correct copy of Rembrandt's corporate structure as depicted by Derek Wood, previously marked as Exhibit 87 to the 30(b)(6) deposition of Rembrandt. [Filed Under Seal]

8. Attached as Exhibit 5 is a true and correct copy of 8,023,580 (the "580 patent").

9. Attached as Exhibit 6 is a true and correct copy of excerpts from the deposition of Zhone 30(b)(6) witness David Misunas. [Filed Under Seal].

10. Attached as Exhibit 7 is a true and correct copy of a collection of product brochures for Zhone 802.11g products, previously marked as Exhibit 48 to the 30(b)(6) deposition of Zhone numbered ZHONE\_004556-4609.

11. Attached as Exhibit 8 is a true and correct copy of a table showing sales of Zhone's 802.11g products, previously marked as Exhibit 49 to the 30(b)(6) deposition of Zhone numbered ZHONE\_004610-11. [Filed Under Seal]

12. Attached as Exhibit 9 is a true and correct copy of a photograph of physical exhibit Exhibit 50 to the 30(b)(6) deposition of Zhone depicting Zhone Technologies XDSL 4 PORT WIFI 802.11N Router, Serial Number 302422860.

13. Attached as Exhibit 10 is a true and correct copy of Rembrandt's infringement contentions.

14. Attached as Exhibit 11 is a true and correct copy of 802.11a Standard

15. Attached as Exhibit 12 is a true and correct copy of 802.11g Standard.

16. Attached as Exhibit 13 is a true and correct copy of 802.11-1999 Standard.

17. Attached as Exhibit 14 is a true and correct copy of portions of Dr. Robert Morrow's infringement expert report served on October 6, 2014.

I declare under penalty of perjury under the laws of the United States of America that, to the best of my knowledge, the foregoing is true and correct.

Dated: November 26, 2014

*/s/ Gerard A. Haddad*

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Gerard A. Haddad